

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re:)	
)	
ROBERT WYN YOUNG)	Civil Action No. 4:25-cv-02057
)	
Appellant.)	

In Re:)	Chapter 7
)	
ALEXANDER E. JONES)	Bankruptcy Case No. 22-33553 (CML)
)	
Debtor.)	

**APPELLANT’S DESIGNATION OF THE RECORD
AND STATEMENT OF THE ISSUE(S) ON APPEAL**

Pursuant to FRBP 8009(a)(1), Pro Se Attorney Intervenor/Interested Party~Appellant, **Robert Wyn Young** (“Appellant” or “Interested Party~Appellant”), hereby submits the following **Designation of the Record and Statement of the Issue(s) on Appeal.**

I. APPELLANT’S DESIGNATION OF THE RECORD ON APPEAL:

Bankruptcy Docket Number	Date Entered in Bankruptcy Docket	Brief Description of Document
1118	03/17/25	Motion to Appear Pro Hac Vice for Robert Wyn Young
1118-1	03/17/25	Proposed Order Granting Motion for Robert Wyn Young to Appear pro hac vice
1119	03/18/25	Order Granting Motion for Robert Wyn Young to Appear pro hac vice
1120	03/19/25	Motion for Leave to Intervene to Present Evidence of Fraudulent Judgment

1120-1	03/19/25	<u>Exhibit 1:</u> Lafferty Fed Ct. Remand File (Full), Trial Ct. Dckt. 112.00
1120-2	03/19/25	<u>Exhibit 2:</u> 02.24.25 Email to CM Saldana re_Jones Ch7
1120-3	03/19/25	<u>Exhibit 3:</u> 02.24.25 Emails w_CM Saldana & Trustee Murray re_Jones Ch7
1120-4	03/19/25	<u>Exhibit 4:</u> 02.24.25 Email to Trustee Murray w_6 Att. re_Jones Ch7
1120-5	03/19/25	<u>Exhibit 5:</u> Lafferty Fed Court Remand Docs (Pgs. 1 thru 93 Only)
1120-6	03/19/25	<u>Exhibit 6:</u> Lafferty Ruling Re_Motion to Remand 11.05.18
1120-7	03/19/25	<u>Exhibit 7:</u> Public Statement re_SH & Alex Jones 11.11.24
1120-8	03/19/25	<u>Exhibit 8:</u> Operation Madcap Highlights PPT 11.10.24
1120-9	03/19/25	<u>Exhibit 9:</u> SE(Patriots List) Re_AJ_SH Part II 12.15.24
1120-10	03/19/25	<u>Exhibit 10:</u> Callender's AJ_SH Endorsement 12.23.24
1120-11	03/19/25	<u>Exhibit 11:</u> 02.27.25 Email to Trustee Murray w_1 Att. re_Jones Ch7
1120-12	03/19/25	<u>Exhibit 12:</u> PwrPnt for Jones BR Trustee
1120-13	03/19/25	<u>Exhibit 13:</u> 02.28.25 Email from Trustee Murray re_Jones Ch7
1120-14	03/19/25	<u>Exhibit 14:</u> 03.04.25 Email to Trustee Murray & Counsel w_1 Att. re_Jones Ch7
1120-15	03/19/25	<u>Exhibit 15:</u> Attachment for 03.04.25 Email to CH7T & UST Counsel
1120-16	03/19/25	<u>Exhibit 16:</u> Newstimes 03.12.25_SH Families Shift Tactics
1120-17	03/19/25	<u>Proposed Order</u> on Motion for Leave to Intervene to Present Evidence of Fraudulent Judgment
1122	03/20/25	BNC Certificate of Mailing. (Re:1119 Order on Motion to Appear pro hac vice)
1124	04/08/25	Response/Opposition of the Connecticut Families to Motion for Leave to Intervene

1126	04/11/25	Motion to Strike Connecticut Families' Opposition to Motion for Leave to Intervene
1126-1	04/11/25	Proposed Order on Motion to Strike Connecticut Families' Opposition to Motion for Leave to Intervene
1128	04/11/25	Reply in Support of Motion for Leave to Intervene to Present Evidence of Fraudulent Judgment
1129	04/22/25	Order Denying Motion for Leave to Intervene
1130	04/24/25	BNC Certificate of Mailing. (R:1129 Order on Motion to Intervene)
1135	05/04/25	Intervenor's Notice of Appeal and Statement of Election
1135-1	05/04/25	Order Denying Motion for Leave to Intervene
1135-2	05/04/25	Motion for Leave to Appeal Order Denying Intervention to Present Evidence of Fraudulent Judgment
1135-3	05/04/25	Civil Cover Sheet of Interested Party-Appellant Robert Wyn Young
1136	05/06/25	Election to Appeal to Court of Appeals. (Young, Robert)
1137	05/07/25	Election to Appeal to District Court. (hl4)
1138	05/07/25	Clerk's Notice of Filing of an Appeal. On 05-04-2025, Robert Wyn Young filed a notice of appeal.
1140	05/09/25	BNC Certificate of Mailing. (Re: 1138 Clerk's Notice of Filing of an Appeal)

II. APPELLANT'S STATEMENT OF THE ISSUE(S) ON APPEAL:

1. In view of the **absolute bar** of bankruptcy discharge for debts incurred by fraud or collusion under **Section 523(a)(2)(A)** of the Bankruptcy Code [as recognized/confirmed by unanimous decision of the Supreme Court in **Bartenwerfer v. Buckley**, 598 U.S. 69 (2023)], does a bankruptcy court abuse its discretion in denying a **Motion for Leave to Intervene to Present Evidence of Fraudulent Judgment** where: (1) operative and admissible

evidence demonstrates **collusion between the parties** to the underlying lawsuit/judgment debt and the bankruptcy proceeding arising therefrom; **(2)** the **Chapter 7 Trustee fails or refuses** to fulfill his duties **to investigate and report** the credible allegation of fraud or collusion; and **(3)** the intervenor has suffered at least a **minimal** or **indirect injury** as a result of the existing parties' fraud or collusion and seeks intervention for the limited and specific purpose of submitting evidence of said fraud or collusion to the bankruptcy court?

Interested Party~Appellant respectfully submits that the question presented should be answered **affirmatively** and that, under the circumstances of this case, it was, indeed, an **abuse of discretion** for the Bankruptcy Court to deny Interested Party~Appellant's requested intervention in Case No. 22-33553 (CML) to present evidence of fraudulent judgment.

Respectfully submitted,

Date: **05/14/25**

/s/ Robert Wyn Young
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***Pro Se Attorney Intervenor/
Interested Party~Appellant***

CERTIFICATE OF SERVICE

I hereby certify that on **May 14, 2025**, I caused a copy of the foregoing **Appellant's Designation of the Record and Statement of the Issue(s) on Appeal** to be served on all subscribed parties by the Electronic Case Filing System of the United States Bankruptcy Court for the Southern District of Texas.

/s/ Robert Wyn Young
Robert Wyn Young